

(SPACE BELOW FOR FILING STAMP ONLY)

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ATTORNEYS FOR Defendant,
SERGIO ALVARADO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiffs,

v.

SERGIO ALVARADO,

Defendants.

Case No: **1:20-cr-00002-DAD-BAM**

APPLICATION FOR MODIFICATION
OF DEFENDANT'S CONDITIONS OF
PRETRIAL RELEASE BASED UPON
AGREEMENT OF PARTIES AND
ORDER

TO: THE HONORABLE MAGISTRATE JUDGE BARBARA McAULIFFE, AND
TO THE UNITED STATES ATTORNEY AND HER REPRESENTATIVE, ASSISTANT
UNITED STATES ATTORNEY, STEPHANIE STOKMAN:

Defendant, SERGIO ALVARADO, by and through his counsel, MARK W.
COLEMAN, NUTTALL & COLEMAN, hereby applies for an order modifying his conditions
of release to release him from electronic GPS/location monitoring, and removing his curfew.

Mr. Alvarado was placed on electronic GPS/location monitoring on December 23, 2019.
Since that time, he has been in continued contact with his pretrial services officer, and has done
everything asked of him, including searching for employment. While searching for

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1 employment, Mr. Alvarado has spent his free time volunteering with Habitat for Humanity, at a
2 local church and Food Bank.

3 Counsel has discussed these proposed modifications with Assistant United States
4 Attorney Stephanie Stokman, Esq., and with his Pretrial Services Officer, Renee Basurto,
5 neither of whom, oppose this request. Mr. Alvarado's Pretrial services officer has confirmed
6 that Mr. Alvarado has been compliant on pretrial release.

7 Mr. Alvarado is hereby requesting that his pretrial release conditions be amended as
8 follows:

9 (1) The Defendant be released from location monitoring and curfew.

10 (2) The Defendant must reside at a location approved by the PSO, and not move or be
11 absent from this residence without prior approval of PSO;

12 (3) The Defendant's travel is restricted to the Eastern District of California, unless
13 otherwise approved in advance by PSO;

14 (4) The Defendant is required to gain prior approval for any overnight stay or travel; and

15 (5) All other conditions of release to remain in full effect and force.

16 Dated: May 20, 2020.

Respectfully submitted,

17 NUTTALL & COLEMAN

18 /s/ Mark W. Coleman

19 MARK W. COLEMAN

Attorney for Defendant,

20 SERGIO ALVARADO

21 **ORDER**

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23 IT IS SO ORDERED.

24 Dated: May 22, 2020



25 UNITED STATES MAGISTRATE JUDGE